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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC., 　　　　Plaintiff, Counter-defendant, 　　　　v. APPLE INC., 　　　　Defendant, Counterclaimant.	Case No. 4:20-CV-05640-YGR-TSH **OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS** Judge: Hon. Yvonne Gonzalez Rogers

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   Pursuant to Civil Local Rules 7-11 and 79-5, Section 12 of this Court's Standing Order regarding Post-Briefing Omnibus Sealing Procedures, and Your Honor's Order Regarding Pending Motions to Seal (Dkt. No. 1660), Plaintiff Epic Games, Inc. ("Epic") and Defendant Apple Inc. ("Apple") (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with the following filings:

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  1. Apple's Motion for Entry of Judgment on Indemnification Counterclaim and supporting papers (filed under seal at Dkt. No. 872);

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  2. Apple's Reply in Support of Apple's Motion for Entry of Judgment on Indemnification Counterclaim and supporting papers (filed under seal at Dkt. No. 893);

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  3. Apple's Opposition to Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 916);

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  4. Epic's Reply Memorandum in Support of Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 922);

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  5. Epic's Corrected Reply Memorandum in Support of Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 926);

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  6. Epic's Opposition to Apple's Motion to Modify Order Regarding Witness Communications and supporting papers (filed under seal at Dkt. No. 1035);

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  7. December 9, 2024 Joint Case Management Statement (filed under seal at Dkt. No. 1067);

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  8. Joint Status Report Re Special Master Review and supporting papers (filed under seal at Dkt. No. 1152);

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  9. Epic's Motion for Relief From a Nondispositive Pretrial Order of a Magistrate Judge and supporting papers (filed under seal at Dkt. No. 1304);

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10. Apple's Motion to Strike Certain Hearing Testimony and supporting papers (filed under seal at Dkt. No. 1327);

11. Apple's Response to Order Regarding Discovery Sanctions and supporting papers (filed under seal at Dkt. No. 1329);

12. Epic's Response to Apple's Opposition to Discovery Sanctions and supporting papers (filed under seal at Dkt. No. 1355);

13. Epic's Opposition to Apple's Motion to Strike Testimony and supporting papers (filed under seal at Dkt. No. 1366);

14. The Parties' exhibits admitted during the evidentiary hearing held on February 24–26, 2025 (filed under seal at Dkt. No. 1543);

15. Epic's Motion for Relief From a Nondispositive Pretrial Order of a Magistrate Judge (filed under seal at Dkt. No. 1621);

I.   Apple's Justification for Requested Sealing

These filings contain a variety of confidential information of the type this Court has previously allowed to remain sealed in this case and of which courts in this District routinely authorize sealing. The general categories of information at issue are listed below, and the following table identifies each of the documents at issue with the particular grounds for the sealing request:

- Apple's internal billing policies, processes, and systems for conducting litigation and managing vendor billing;

- negotiations with Apple's vendors during this litigation;

- financial data relating to costs expended by Apple in this litigation;

- financial analysis, research, and decision-making about pricing;

- business codenames regarding ongoing confidential projects;

- injunction compliance plans;

- document review protocols drafted by outside counsel and internal Apple legal guidance drafted by in-house counsel (with the input of outside counsel); and

- personal identifying information.

Apple operates in an intensely competitive environment, and thus has taken extensive measures to protect the confidentiality of its information. Public access to this information could cause Apple economic harm and put it at a disadvantage with competitors.

Epic takes no position on the justifications set forth by Apple above or the sealing requests made by Apple below .

II.   Sealing Requests

All of the sealing motions at Dkt. Nos. 872, 893, 916, 922, 926, 1035, 1067, 1152, 1304, 1327, 1329, 1355, 1366, 1543, and 1621 were unopposed.[1]

UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR WITH REDACTIONS					
Dkt. No.	Sealing Party[2]	Portion to be Sealed	Description	Sealing Basis[3] (Supporting Declaration)	Previously Sealed
872-3	Apple	Redacted as reflected in the highlighted text	Apple's Motion for Entry of Judgment	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor	No

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[1] To the extent it is not explicitly stated as a basis for sealing, Apple requests that all Personally Identifiable Information ("PII") present in any of the documents discussed herein is maintained under seal. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data.

[2] "Sealing Party" refers to the party seeking to seal the material described herein, irrespective of which party originally filed the information under seal.

[3] Each "sealing basis" described in this stipulation is the representation of the "sealing party."

OMNIBUS SEALING STIPULATION
ON UNDISPUTED SEALING REQUESTS   CASE NO. 4:20-CV-05640-YGR-TSH

				billing; (2) negotiations with each of Apple's vendors during the Epic matter; and/or (3) financial information relating to costs expended by Apple in the *Epic* litigation contained in Motion. (Dkt. No. 872-1)	
872-4	Apple	Redacted as reflected in the highlighted text	Declaration of Mark Rollins	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; (2) negotiations with each of Apple's vendors during the Epic matter; and/or (3) financial information relating to costs expended by Apple in the *Epic* litigation contained in declaration. (Dkt. No. 872-1)	No
872-5	Apple	Redacted as reflected in the highlighted text	Declaration of Carlyn Irwin	Competitively sensitive, non-public information regarding	No

				Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; (2) negotiations with each of Apple's vendors during the Epic matter; and/or (3) financial information relating to costs expended by Apple in the *Epic* litigation contained in declaration. (Dkt. No. 872-1)	
872-6	Apple	Redacted as reflected in the highlighted text	Ex. B to Irwin Declaration	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; (2) negotiations with each of Apple's vendors during the Epic matter; and/or (3) financial information relating to costs expended by Apple in the *Epic* litigation contained in	No

				exhibit. (Dkt. No. 872-1)	
872-7	Apple	Redacted as reflected in the highlighted text	Ex. C to Irwin Declaration	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in exhibit. (Dkt. No. 872-1)	No
872-8	Apple	Entire document	Ex. E to Irwin Declaration	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in exhibit. (Dkt. No. 872-1)	No

| 872-9 | Apple | Redacted as reflected in the highlighted text | Declaration of Richard M. Pearl | Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in declaration. (Dkt. No. 872-1) | No |
| 872-10 | Apple | Redacted as reflected in the highlighted text | Ex. A to Pearl Declaration | Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in declaration. (Dkt. No. 872-1) | No |

| 893-3 | Apple | Redacted as reflected in the highlighted text | Apple's Reply in Support of Motion for Entry of Judgment | Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in Reply. (Dkt. No. 893-1) | No |
| 893-4 | Apple | Redacted as reflected in the highlighted text | Supplemental Declaration of Mark Rollins | Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the *Epic* litigation contained in declaration. (Dkt. No. 893-1) | No |

1067-3	Apple	Redacted as reflected in the highlighted text	Case Management Statement	Competitively sensitive, non-public information regarding Apple's business codenames regarding ongoing confidential projects. (Dkt. No. 1067-1)	No
1152-1	Apple	Redacted as reflected in the highlighted text	Exhibit A to Joint Status Report	Competitively sensitive, non-public information regarding Apple's project codenames and its retention of outside counsel, as well as personally identifying information in the form of email addresses of Apple's employees. (Dkt. No. 1186-1)	No
1304-2	Apple	Redacted as reflected in the highlighted text	Epic Games, Inc's Motion for Relief from Nondispositive Order of a Magistrate Judge	Competitively sensitive, non-public information regarding Apple's engagement of outside legal counsel and consultants in connection with press and communications legal strategy. (Dkt. No. 1341-1)	No
1304-2	Apple	Redacted as reflected in the highlighted text	Exhibit A to Epic Games, Inc's Motion for Relief from	Exhibit A contains personally identifiable	----

			Nondispositive Order of a Magistrate Judge	information in the form of email addresses of Apple employees. (Dkt. No. 1341-1)	
1329-3	Apple	Redacted portions as reflected in the highlighted text	Apple Inc.'s Response to Order Regarding Discovery Sanctions	Apple's Response includes quotations from document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. This information is protected by the attorney-client privilege and work-product doctrine. (Dkt. No. 1329-1)	No
1329-4	Apple	Redacted portions as reflected in the highlighted text	Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	The Perry Declaration includes quotations from document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple	No

				legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. This information therefore is protected by the attorney-client privilege and work-product doctrine. (Dkt. No. 1329-1)	
1329-5	Apple	Entire document	Exhibit A to Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	Document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. (Dkt. No. 1329-1)	No
1329-6	Apple	Entire document	Exhibit B to Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	Document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance	No

				drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. (Dkt. No. 1329-1)	
1329-7	Apple	Entire document	Exhibit C to Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	Document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. (Dkt. No. 1329-1)	No
1329-8	Apple	Entire document	Exhibit D to Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	Document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple	No

				employees. (Dkt. No. 1329-1)	
1329-9	Apple	Entire document	Exhibit K to Declaration of Mark A. Perry in Support of Apple Inc.'s Response to Order Regarding Discovery Sanctions	Document review protocols drafted by outside counsel to direct the document review conducted in connection with discovery in this case and internal Apple legal guidance drafted by in house counsel (with the input of outside counsel) for the purpose of providing legal advice to Apple employees. (Dkt. No. 1329-1)	No
1355-2	Apple	Redacted portions as reflected in the highlighted text	Exhibit A to Epic Games' Response to Apple's Opposition to Discovery Sanctions	Contains nonpublic Apple security information, in the form of Apple web conference login and conference room information. Disclosure of the redacted information relating to non-public sensitive financial information could harm Apple's business interests and/or affect its market position. (Dkt. No. 1378-1)	No
1355-3	Apple	Redacted portions as reflected in the highlighted text	Epic Games' Response to Apple's Opposition to	Contains competitively sensitive, non-public information	No

			Discovery Sanctions	regarding Apple's financial information. Disclosure of the redacted information relating to non-public sensitive financial information could harm Apple's business interests and/or affect its market position. (Dkt. No. 1378-1)	
1543-2	Apple	Redacted portions as reflected in the highlighted text	CX-0009	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-3	Apple	Redacted portions as reflected in the highlighted text	CX-0009-A	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances,	No

				projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-4	Apple	Redacted portions as reflected in the highlighted text	CX-0014	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-5	Apple	Redacted portions as reflected in the highlighted text	CX-0015	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No

1543-6	Apple	Redacted portions as reflected in the highlighted text	CX-0054	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-7	Apple	Redacted portions as reflected in the highlighted text	CX-0202	Contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-8	Apple	Redacted portions as reflected in the highlighted text	CX-0216	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information	No

				consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-9	Apple	Redacted portions as reflected in the highlighted text	CX-0223	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-10	Apple	Redacted portions as reflected in the highlighted text	CX-0224	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary	No

				information. (Dkt. No. 1544-1)	
1543-11	Apple	Redacted portions as reflected in the highlighted text	CX-0225	Contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-12	Apple	Redacted portions as reflected in the highlighted text	CX-0227	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-13	Apple	Redacted portions as reflected in the highlighted text	CX-0229	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No

1543-14	Apple	Redacted portions as reflected in the highlighted text	CX-0231	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-15	Apple	Redacted portions as reflected in the highlighted text	CX-0244	Contains information that relates to Public Relations ("PR") professionals' private text message conversations that include discussions of hiring and headcount needs, PR work in general, and personal musings, that if revealed, may cause reputational harm and undue attention toward the employees. (Dkt. No. 1544-1)	No
1543-16	Apple	Redacted portions as reflected in the highlighted text	CX-0246	Contains information that reflects or relates to sensitive	No

				business information of a third-party developer—specifically, finances and user data—which, if revealed, could impact their competitive standing. (Dkt. No. 1544-1)	
1543-17	Apple	Redacted portions as reflected in the highlighted text	CX-0257	Contains information that relates to PR professionals' private text message conversations that include discussions of hiring and headcount needs, PR work in general, and personal musings, that if revealed, may cause reputational harm and undue attention toward the employees. (Dkt. No. 1544-1)	No
1543-18	Apple	Redacted portions as reflected in the highlighted text	CX-0264	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-19	Apple	Redacted portions as reflected in the highlighted text	CX-0265	Contains non-public, competitively sensitive financial information	No

				that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. Additionally, this document contains privileged information, which has been clawed back following inadvertent production. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1)	
1543-20	Apple	Redacted portions as reflected in the highlighted text	CX-0266	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No

1543-21	Apple	Redacted portions as reflected in the highlighted text	CX-0268	Contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. Also contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-22	Apple	Redacted portions as reflected in the highlighted text	CX-0272	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. 1544-1)	No
1543-23	Apple	Redacted portions as reflected in the highlighted text	CX-0279	Contains non-public, competitively	No

				sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-24	Apple	Redacted portions as reflected in the highlighted text	CX-0281	Contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-25	Apple	Redacted portions as reflected in the highlighted text	CX-0291	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections,	No

				estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-26	Apple	Redacted portions as reflected in the highlighted text	CX-0384	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-27	Apple	Redacted portions as reflected in the highlighted text	CX-0435	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-28	Apple	Redacted portions as reflected in the highlighted text	CX-0464	Contains information that relates to PR professionals' private text message conversations that include discussions of hiring and headcount needs, PR work in general, and personal musings, that if revealed, may cause reputational harm and undue attention toward the employees. (Dkt. No. 1544-1)	No

1543-29	Apple	Redacted portions as reflected in the highlighted text	CX-0478	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-30	Apple	Redacted portions as reflected in the highlighted text	CX-0479	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-31	Apple	Redacted portions as reflected in the highlighted text	CX-0484	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-32	Apple	Redacted portions as reflected in the highlighted text	CX-0485	Contains PII. Disclosure of employees' PII could jeopardize	No

				their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	
1543-33	Apple	Redacted portions as reflected in the highlighted text	CX-0486	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-34	Apple	Redacted portions as reflected in the highlighted text	CX-0487	Contains competitively sensitive internal project codenames. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-35	Apple	Redacted portions as reflected in the highlighted text	CX-0488	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-36	Apple	Redacted portions as reflected in the highlighted text	CX-0489	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal	No

				data. (Dkt. No. 1544-1)	
1543-37	Apple	Redacted portions as reflected in the highlighted text	CX-0490	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-38	Apple	Redacted portions as reflected in the highlighted text	CX-0496	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, contains a competitively sensitive internal project codename. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-39	Apple	Redacted portions as reflected in the highlighted text	CX-0499	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains	No

				privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1)	
1543-40	Apple	Redacted portions as reflected in the highlighted text	CX-0503	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-41	Apple	Redacted portions as reflected in the highlighted text	CX-0505	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's	No

				class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1)	
1543-42	Apple	Redacted portions as reflected in the highlighted text	CX-0506	Contains competitively sensitive internal project codenames. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. This document also contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be	No

				exploited. (Dkt. No. 1544-1)	
1543-43	Apple	Redacted portions as reflected in the highlighted text	CX-0509	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-44	Apple	Redacted portions as reflected in the highlighted text	CX-0511	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-45	Apple	Redacted portions as reflected in the highlighted text	CX-0532	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1543-46	Apple	Redacted portions as reflected in the highlighted text	CX-0538	Contains competitively sensitive internal project codenames. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. This document also contains PII. Disclosure of	No

				employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1)	
1543-47	Apple	Redacted portions as reflected in the highlighted text	CX-0539	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances,	No

				projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-48	Apple	Redacted portions as reflected in the highlighted text	CX-0540	Contains information that relates to PR professionals' private text message conversations that include discussions of hiring and headcount needs, PR work in general, and personal musings, that if revealed, may cause reputational harm and undue attention toward the employees. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1)	No

| 1543-49 | Apple | Redacted portions as reflected in the highlighted text | CX-0859 | Contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1) | No |
| 1543-50 | Apple | Redacted portions as reflected in the highlighted text | CX-1103 | Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dkt. No. 1544-1) | No |

1543-51	Apple	Redacted portions as reflected in the highlighted text	CX-1208	Contains competitively sensitive internal project codenames. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-52	Apple	Redacted portions as reflected in the highlighted text	CX-1211	Contains competitively sensitive internal project codenames. Disclosure of confidential project codenames would harm Apple's business interests and/or aid bad actors to harm Apple, its customers, and developers. (Dkt. No. 1544-1)	No
1543-53	Apple	Redacted portions as reflected in the highlighted text	CX-1303	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections,	No

				estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	
1543-54	Apple	Redacted portions as reflected in the highlighted text	CX-1304	Contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances, projections, estimates, and developer cost estimates based on proprietary information. (Dkt. No. 1544-1)	No
1543-55	Apple	Redacted portions as reflected in the highlighted text	CX-1310	Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1544-1)	No
1621-2	Apple	Redacted portions as reflected in the highlighted text	Exhibit A to Epic's Motion for Relief from a Non-Dispositive Order of a Magistrate Judge	Epic's Motion contains excerpts of Apple's privilege log, including PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. (Dkt. No. 1638)	No

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UNDISPUTED REQUEST TO MODIFY EXTENT OF SEALING					
Dkt. No.	Sealing Party	Portion to be Sealed	Description	Sealing Basis (Supporting Declaration)	Previously Sealed
916-3	Apple	Redactions indicated in the attached version	Apple Inc.'s Opposition to Epic Games, Inc.'s Motion to Enforce Injunction	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in Opposition. (Dkt. No. 916-1)	No
916-5	Apple	Redactions indicated in the attached version	Declaration of Alex Roman In Support of Apple Inc.'s Opposition	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in declaration. (Dkt. No. 916-1)	No
916-7	Apple	Redactions consistent with Dkt. No. 1542-5 and indicated in the attached version	Exhibit 1 to Alex Roman Declaration	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in declaration. (Dkt. No. 916-1)	No
922-1	Apple	Redactions indicated in the attached version	Reply Memorandum re Motion to Enforce Injunction	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions	No

				contained in Epic's reply. (Dkt. No. 933-1)	
922-2	Apple	Redactions indicated in the attached version	Declaration of Ned S. Barnes	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in expert declaration filed in support of Epic's motion. (Dkt. No. 933-1)	No
926-1	Apple	Redactions indicated in the attached version	Corrected Reply Memorandum re Motion to Enforce Injunction	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in Epic's reply. (Dkt. No. 933-1)	No
926-2	Apple	Redactions indicated in the attached version	Declaration of Ned S. Barnes	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in expert declaration filed in support of Epic's motion. (Dkt. No. 933-1)	No
1035-2	Apple	Redactions consistent with Dkt. No. 1542-26 and indicated in the attached version	Exhibit A to Epic's Opposition to Apple's Motion to Modify Order Regarding Witness Communications	Competitively sensitive business information regarding the hiring needs of Apple's PR department and PR strategy as	No

				well as personally identifiable information contained in Exhibit A to Epic's motion. (Dkt. No. 1037)	

Pursuant to this Court's sealing procedures detailed in Section 12 of the Standing Order, the following are attached hereto: (i) the Declarations of Mark A. Perry and Cynthia Richman supporting the requests to seal; (ii) the redacted versions of the eight documents whose sealing the parties seek to modify; and (iii) a Proposed Order On Undisputed Sealing Requests.

IT IS SO STIPULATED, through Counsel of Record.

Dated: August 12, 2025

Respectfully submitted,

By: /s/ *Gary A. Bornstein*

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Respectfully submitted,

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E-FILING ATTESTATION

I, Mark Perry, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Mark A. Perry

Mark A. Perry